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REDACTED – FOR PUBLIC INSPECTION

Received & inspected

JUN 29 2015

FCC Mail Room

June 26, 2015

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: **WC Docket No. 14-58**
2015 ETC Annual Report of Amherst Telephone Company (SAC 330843)

Dear Ms. Dortch:

On behalf of **Amherst Telephone Company**, Kiesling Associates LLP files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.¹ **Amherst Telephone Company** seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, an attached letter requests confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).³

Please direct any questions about this filing to the undersigned at 608-664-9110 or rabrams@kiesling.com.

Sincerely,

KIESLING ASSOCIATES LLP

Robert R. Abrams
Senior Telecommunications Consultant

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)
Peter Jahn, Division of Business & Communications Services, Public Service Commission of Wisconsin

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).

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Washington, DC 20554

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**Re: WC Docket 14-58
2015 ETC Annual Report of Amherst Telephone Company (SAC 330843)
Request for Confidentiality**

Dear Ms. Dortch:

On behalf of **Amherst Telephone Company** (the "Company"), Kiesling associates LLP hereby requests withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement, pursuant to Sections 0.457 and 0.459 of the Commission's rules.¹ The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment is the attachment at Line 112 of the Company's annual reporting information in FCC Form 481, pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").³
2. Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan ("Progress Report") which is contained in the attachment to the 2015 Report.⁴
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan, as provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.
4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ 47 C.F.R. §§ 54.313(a)(1).

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In its *March 5, 2013 Order*, the FCC specified that for rate-of-return carriers, the five-year plans “should describe the carrier’s network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories.”⁵ The Company is a rate-of-return carrier filing its five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company’s existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company’s existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company’s serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to existing and potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company’s customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.
7. Previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

⁵ See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) (“*March 5, 2013 Order*”) at para. 9 citing Section 54.202(a) (1) (ii).


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Based on the preceding, Kiesling respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned at 608-664-9110 or rabrams@kiesling.com with questions regarding this request.

Sincerely,

KIESLING ASSOCIATES LLP



Robert R. Abrams
Senior Telecommunications Consultant

cc: Peter Jahn, Division of Business & Communications Services, Public Service Commission of Wisconsin

FCC Form 481 - Carrier Annual Reporting
Data Collection Form

REDACTED - FOR PUBLIC INSPECTION

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0818
July 2013

<010> Study Area Code 330843

<015> Study Area Name AMHERST TEL CO

<020> Program Year 2016

<030> Contact Name: Person USAC should contact with questions about this data Richard Letto

<035> Contact Telephone Number: 7158245529 ext. Number of the person identified in data line <030>

<039> Contact Email Address: rletto@tvalleycom.com Email of the person identified in data line <030>

Received & Inspected

JUN 29 2015

FCC Mail Room

ANNUAL REPORTING FOR ALL CARRIERS

54,313 Completion Required
54,422 Completion Required

(check box when complete)

<100> Service Quality Improvement Reporting (complete attached worksheet) ☒ ☒

<200> Outage Reporting (voice) (complete attached worksheet) ☒ ☒

<210> ☐ <-- check box if no outages to report ☒ ☒

<300> Unfulfilled Service Requests (voice) 0 ☐ ☒

<310> Detail on Attempts (voice) ☐ ☒
(attach descriptive document)

<320> Unfulfilled Service Requests (broadband) 0 ☐ ☒

<330> Detail on Attempts (broadband) ☐ ☒
(attach descriptive document)

<400> Number of Complaints per 1,000 customers (voice)

<410> Fixed 0.0 ☒ ☒

<420> Mobile 0.0 ☒ ☒

<430> Number of Complaints per 1,000 customers (broadband)

<440> Fixed 0.0 ☒ ☒

<450> Mobile 0.0 ☒ ☒

<500> Service Quality Standards & Consumer Protection Rules Compliance (check to indicate certification) ☒ ☒

330843w1510.pdf

<510> (attached descriptive document) ☒ ☒

<600> Functionality in Emergency Situations (check to indicate certification) ☒ ☒

330843w1610.pdf

<610> (attached descriptive document) ☒ ☒

<700> Company Price Offerings (voice) (complete attached worksheet) ☒ ☒

<710> Company Price Offerings (broadband) (complete attached worksheet) ☒ ☒

<800> Operating Companies and Affiliates (complete attached worksheet) ☒ ☒

<900> Tribal Land Offerings (Y/N)? ☐ ☒ (if yes, complete attached worksheet) ☒ ☒

<1000> Voice Services Rate Comparability Certification Yes ☐ ☒

<1010> (attach descriptive document) ☐ ☒

<1100> Certify whether terrestrial backhaul options exist (Yes or No) ☒ ☐ (if not, check to indicate certification) ☒ ☒

<1110> (complete attached worksheet) ☐ ☒

<1200> Terms and Condition for Lifeline Customers (complete attached worksheet) ☒ ☒

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000> (check to indicate certification) ☐ ☒

<2005> (complete attached worksheet) ☐ ☒

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000> (check to indicate certification) ☒ ☒

<3005> (complete attached worksheet) ☒ ☒

(100) Service Quality Improvement Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	330843
<015> Study Area Name	AMHERST TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Richard Letto
<035> Contact Telephone Number - Number of person identified in data line <030>	7158245529 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	rletto@tvalleycom.com
<110> Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
If your answer to Line <110> is yes, do you have an existing §54.202(a) "5	
<111> year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

330843w1112.pdf

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How much (USF) was used to improve service quality and how support was used to improve service quality
- <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
- <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Not Applicable

(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	330843
<015>	Study Area Name	AMHERST TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Richard Letto
<035>	Contact Telephone Number - Number of person identified in data line <030>	7158245529 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rletto@tvalleycom.com

[illegible]

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<039>	Contact Email Address - Email Address of person identified in data line <030>	rletto@tvalleycom.com
-------	---	-----------------------

1/1/2015

<702> Single State-wide Residential Local Service Charge

Total per line Rates and Fees	
Line	Rate
1	1.00
2	1.00
3	1.00
4	1.00
5	1.00
6	1.00
7	1.00
8	1.00
9	1.00
10	1.00
11	1.00
12	1.00
13	1.00
14	1.00
15	1.00
16	1.00
17	1.00
18	1.00
19	1.00
20	1.00
21	1.00
22	1.00
23	1.00
24	1.00
25	1.00
26	1.00
27	1.00
28	1.00
29	1.00
30	1.00
31	1.00
32	1.00
33	1.00
34	1.00
35	1.00
36	1.00
37	1.00
38	1.00
39	1.00
40	1.00
41	1.00
42	1.00
43	1.00
44	1.00
45	1.00
46	1.00
47	1.00
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50	1.00
51	1.00
52	1.00
53	1.00
54	1.00
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63	1.00
64	1.00
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68	1.00
69	1.00
70	1.00
71	1.00
72	1.00
73	1.00
74	1.00
75	1.00
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77	1.00
78	1.00
79	1.00
80	1.00
81	1.00
82	1.00
83	1.00
84	1.00
85	1.00
86	1.00
87	1.00
88	1.00
89	1.00
90	1.00
91	1.00
92	1.00
93	1.00
94	1.00
95	1.00
96	1.00
97	1.00
98	1.00
99	1.00
100	1.00

See attached worksheet

(900) Tribal Lands Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
--	--

<010>	Study Area Code	330843
<015>	Study Area Name	AMHERST TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Richard Letto
<035>	Contact Telephone Number - Number of person identified in data line <030>	7158245529 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rletto@tvalleycom.com

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	330843
<015>	Study Area Name	AMHERST TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Richard Letto
<035>	Contact Telephone Number - Number of person identified in data line <030>	7158245529 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rletto@tvalleycom.com

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	330843
<015>	Study Area Name	AMHERST TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Richard Letto
<035>	Contact Telephone Number - Number of person identified in data line <030>	7158245529 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rletto@tvalleycom.com

330843wil1210 .pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

(2000) Price Cap Carrier Additional Documentation Data Collection Form <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	330843
<015> Study Area Name	AMHERST TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	RICHARD LATTO
<035> Contact Telephone Number - Number of person identified in data line <030>	7158245323 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	rlatto@valleycom.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)i}
- <2011a> 3rd Year Certification {47 CFR § 54.313(b)(1)ii}
- <2011b> Attachment {47 CFR § 54.313(b)(1)ii}

Name of Attached Document(s) Listing Required Information

Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

- <2012> 2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}
- <2013> 2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}
- <2014> 2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}
- <2015> 2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

- <2016> Certification Support Used to Build Broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification
- <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information

REDACTED - FOR PUBLIC INSPECTION

(3000) Rate Of Return Carrier Additional Documentation
Data Collection Form

FCC Form 481

OMB Control No. 3060-0066/OMB Control No. 3060-0819

July 2013

<010> Study Area Code	330843
<015> Study Area Name	AMHERST TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Richard Letto
<035> Contact Telephone Number - Number of person identified in data line <030>	7158245529 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	rletto@valleycom.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

330843w13010.pdf

- (3010) Progress Report on 5 Year Plan
Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

- (3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☒

330843w13012.pdf

- (3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

- (3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))
(3014) If yes, does your company file the RUS annual report

(Yes/No) ☒ ☒
(Yes/No) ☒ ☒

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

- (3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) ☐
(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

- (3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

- (3018) If the response is no on line 3014, is your company audited?

(Yes/No) ☒ ☒

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

- (3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications ☒
(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☒
(3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit ☒

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

- (3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, ☐
(3023) Underlying information subjected to a review by an independent certified public accountant ☐
(3024) Underlying information subjected to an officer certification. ☐
(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

330843w13026.pdf

- (3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

REDACTED - FOR PUBLIC INSPECTION

(3000) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0386/OMB Control No. 3060-0819

July 2013

<010> Study Area Code	330843
<015> Study Area Name	AMHERST TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Richard Letto
<035> Contact Telephone Number - Number of person identified in data line <030>	7158245529 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	rletto@valleycom.com

Financial Data Summary

(3027) Revenue

REDACTED

(3028) Operating Expenses

REDACTED

(3029) Net Income

REDACTED

(3030) Telephone Plant In Service(TPIS)

REDACTED

(3031) Total Assets

REDACTED

(3032) Total Debt

REDACTED

(3033) Total Equity

REDACTED

(3034) Dividends

REDACTED

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	330843
<015> Study Area Name	AMHERST TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Richard Letto
<035> Contact Telephone Number - Number of person identified in data line <030>	7158245529 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	rletto@tvalleycom.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	330843
<015> Study Area Name	AMHERST TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Richard Letto
<035> Contact Telephone Number - Number of person identified in data line <030>	7158245529 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	rlotto@tvalleycom.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Kiesling Associates LLP</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	Kiesling Associates LLP
Name of Reporting Carrier:	AMHERST TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/25/2015
Printed name of Authorized Officer:	Carl Bohman
Title or position of Authorized Officer:	President
Telephone number of Authorized Officer:	7158245529 ext.
Study Area Code of Reporting Carrier:	330843 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	AMHERST TEL CO
Name of Authorized Agent or Employee of Agent:	Kiesling Associates LLP
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/25/2015
Printed name of Authorized Agent or Employee of Agent:	Robert R. Abrams
Title or position of Authorized Agent or Employee of Agent:	Communications Consultant
Telephone number of Authorized Agent or Employee of Agent:	6086649110 ext. 243
Study Area Code of Reporting Carrier:	330843 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

REDACTED - FOR PUBLIC INSPECTION

Attachments

REDACTED - FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

AMHERST TELEPHONE COMPANY (SAC 330843)

ATTACHMENT - LINE 112

PROGRESS REPORT TO THE
FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

ATTACHMENT REDACTED IN ENTIRETY

FCC Form 481 – Line 510 – Service Quality Standards & Consumer Protection Rules

SAC: 330843
State: WI
Name: Amherst Telephone Company
Submission: 7/1/2015

47 CFR §54.313(a)(5) requires an ETC to certify that it complies with applicable service quality standards and consumer protection rules.

Amherst Telephone Company complies with applicable service quality standards for telecommunications providers in the Wisconsin State Statutes (§§100.207 and .208) regulating, advertising, sales and collections practices, and as applicable, those of the Public Service Commission of Wisconsin in the Wisconsin Administrative Code (*Ch. PSC 165*), regarding Standards for Telecommunications Service.

Amherst Telephone Company complies with consumer protection requirements including those found in federal Customer Proprietary Network Information (*CPNI; WC Docket No. 04-36*), those of the Wisconsin Department of Agriculture, Trade and Consumer Protection (*Ch. ATC 123*) covering appropriate subscription and billing practices and (*Ch. ATC 127*) covering appropriate direct marketing practices.

Amherst Telephone Company certifies it has complied with these requirements and will continue to comply with these requirements.

FCC Form 481 – Line 610 Ability To Remain Functional In An Emergency Situation

SAC: 330843
State: WI
Name: Amherst Telephone Company
Submission: 7/1/2015

47 CFR §54.313(a)(6) requires an ETC to certify that it is able to function in emergency situation as set forth in 47 CFR §54.202 (a)(2).

Amherst Telephone Company complies with relevant sections of the Wisconsin Administrative Code, Standards for Telecommunications Service (*Ch. PSC 165.065*) requiring that it “shall make reasonable provision to meet emergencies resulting from national security requirements, failures of lighting or power service, sudden and prolonged increases in traffic, illness of personnel, or from fire, storm, or similar emergencies”.

The company has maintained reasonably adequate provisions for emergency power in response to emergency situations, and has performed weekly tests of its back-up power generation capabilities.

Designated employees are informed as to procedures to be followed in the event of an emergency in order to prevent or mitigate interruption or impairment of telecommunications service, including rerouting of traffic around damaged facilities and the deployment of emergency power.

Amherst Telephone Company certifies it has complied with, and will continue to comply with applicable requirements regarding its ability to remain functional in an emergency situation as set forth in 47 CFR §54.202 (a)(2).

REDACTED - FOR PUBLIC INSPECTION

(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code 330843

<015>	Study Area Name	AMHERST TEL CO
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<020>	Program Year	2016
-------	--------------	------

<030>	Contact Name - Person USAC should contact regarding this data	Richard Letto
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<035>	Contact Telephone Number - Number of person identified in data line <030>	7158245529 ext.
-------	---	-----------------

<039>	Contact Email Address - Email Address of person identified in data line <030>	rletto@tvalleycom.com
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<220>

[illegible]

REDACTED - FOR PUBLIC INSPECTION

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	330843
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<015>	Study Area Name	AMHERST TEL CO
-------	-----------------	----------------

<020>	Program Year	2016
-------	--------------	------

<030>	Contact Name - Person USAC should contact regarding this data	Richard Letto
-------	---	---------------

<035> Contact Telephone Number - Number of person identified in data line <030> 7150245529 ext.

<039>	Contact Email Address - Email Address of person identified in data line <030>	rletto@tvalleycom.com
-------	---	-----------------------

<701> Residential Local Service Charge Effective Date 1/1/2015

<702> Single State-wide Residential Local Service Charge

<703>

[illegible]

REDACTED - FOR PUBLIC INSPECTION

(710) Broadband Price Offerings Data Collection Form FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	330843
<015>	Study Area Name	AMHERST TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Richard Letto
<035>	Contact Telephone Number - Number of person identified in data line <030>	7158245529 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rletto@valleycom.com

[illegible]

REDACTED - FOR PUBLIC INSPECTION

(800) Operating Companies
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	330843
<015>	Study Area Name	AMHERST TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Richard Letto
<035>	Contact Telephone Number - Number of person identified in data line <030>	7158245529 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rletto@tvalleycom.com
<810>	Reporting Carrier	Amherst Telephone Company
<811>	Holding Company	Amherst Telephone Company
<812>	Operating Company	Amherst Telephone Compan

[illegible]

FCC Form 481 – Line 1210 Lifeline Service Terms & Conditions

SAC: 330843
State: WI
Name: Amherst Telephone Company
Submission: 7/1/2015

Amherst Telephone Company offers Lifeline service to qualifying subscribers.

- Qualifying subscribers receive Lifeline credits totaling \$10.00 (\$9.25 via the federal Low Income program, plus \$0.75 via the Wisconsin Universal Service Fund) on their telephone bill. The Lifeline benefit reduces the regular monthly rate for any single line residential local telephone service. This benefit is limited to one per qualifying household, and for service received from a single provider.
- Number of Local Minutes/Calls Provided: Unlimited local calling.
- Additional Charges for Toll Calls: Toll calls and services for Lifeline subscribers are available and are billed at carriers' standard rates.
- No monthly or non-recurring charges for toll blocking features, pursuant to PSC 160.04, Wis. Adm. Code.
- Federal program eligibility for Lifeline service must be confirmed before the credit is issued. All subscribers must be recertified at least once each year.

Lifeline eligibility requires that income be no higher than 135% of the federal Poverty Guideline level, and/or participation in at one of the following programs, verified at least once each year:

- Wisconsin Works (W2)
- Medical Assistance (MA)/Badger Care/Medicaid
- Supplemental Security Income (SSI)
- Food Stamps (SNAP)
- Low Income Home Energy Assistance Program (LIHEAP)
- Wisconsin Homestead Tax Credit (Schedule H)
- Temporary Assistance for Needy Families (TANF)
- Federal Public Housing Assistance (FPHA)/Section 8
- National School Lunch – Free Lunch Program
- Head Start (if income eligibility criteria are met)

The Company's local tariff Terms and Conditions for Lifeline Service are attached.

Form 10 Rate

PUBLIC SERVICE COMMISSION OF WISCONSIN
TELEPHONE RATE FILE

AMHERST TELEPHONE COMPANY

Name of Utility

Exchange ALL
Section No. 4
Sheet No. 4
Amendment No. 2 3

EXCHANGE ACCESS SERVICES

LIFELINE SERVICE

A. DESCRIPTION

1. Lifeline Service is a residence service offering that provides a discounted monthly rate to customers who qualify for low income assistance programs as defined in s. PSC 160.02(8), Wis Adm. Code.
2. Lifeline Service provides a monthly discount to eligible residence customers that have a network access line (including Extended Area Service), touch-tone service, 911 Service (billed on the customer's telephone bill), and the End User Common Line Charge (EUCL). If the customer has measured service, 120 local calls are provided. Extended Community Calling (ECC) Service is not included in Lifeline Service.
3. Lifeline Service monthly rates for residence customers are established according to s. PSC 160.062(1), (2) and (3), Wis Adm. Code.

B. REGULATIONS

1. Lifeline Service is only available for residence customers with a single line network access line in their principle place of residence.
2. Lifeline Service is not available to customers who are dependents for federal income tax purposes as defined in 26 USC 152 (1986), unless the customer is more than 60 years old.
3. Lifeline Service customers must complete and remit any required query authorization forms requested by the Company or forfeit eligibility for Lifeline Service.
4. Eligibility for Lifeline Service must be verified by the Company by finding the Social Security Number and name of the listed customer in active records of the Department of Workforce Development or the Wisconsin Department of Revenue.

Issued _____ Applicable to bills rendered on and after

PSCW Authorization by order No. _____

Letter JAN 5 1998

JAN 01 1998

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REDACTED - FOR PUBLIC INSPECTION

Form 10 Rate

PUBLIC SERVICE COMMISSION OF WISCONSIN
TELEPHONE RATE FILE

AMHERST TELEPHONE COMPANY

Name of Utility

Exchange ALL

Section No. 4

Sheet No. 5

Amendment No. _____

EXCHANGE ACCESS SERVICES

LIFELINE SERVICE (Cont'd)

B REGULATIONS (Cont'd)

5. Reconfirmation of Eligibility for Lifeline Service

- a. Reconfirmation of eligibility for Lifeline Service will be done at least once each year.
- b. If a customer cannot reconfirm eligibility for Lifeline Service, eligibility will continue until the next bill date following failure to meet the eligibility requirements.
- c. When the Low Income Household Energy Assistance Program is one of the customer's qualifying low income assistance programs, the eligibility for Lifeline Service shall continue until the bill date in the next December following the close of the heating season. At that time, if eligibility cannot be re-verified by the Company Lifeline Service will be removed from the customers bill.
- d. When the Wisconsin Homestead Tax Credit is one of the customer's qualifying low income assistance programs, the eligibility for Lifeline Service shall continue until the bill date in the next June following the end of the tax year. At that time, if eligibility cannot be re-verified by the Company Lifeline Service will be removed from the customers bill.
- e. Eligibility confirmation through receipt of the Wisconsin Homestead Tax Credit will not become effective until the date set by the Commission upon its acknowledgment that an acceptable data base query process is in place.

Issued _____ Applicable to bills rendered on and after _____

PSCW Authorization by order No. _____

Letter _____

Form 10 Rate

PUBLIC SERVICE COMMISSION OF WISCONSIN
TELEPHONE RATE FILE

AMHERST TELEPHONE COMPANY

Name of Utility

Exchange	ALL
Section No.	4
Sheet No.	6
Amendment No.	71

EXCHANGE ACCESS SERVICES

LIFELINE SERVICE (Cont'd)

B. REGULATIONS (Cont'd)

6. Lifeline Service will appear as a credit or rate reduction on the customer's bill on the next date following the date the customer applied for Lifeline Service. When the customer's eligibility precedes the previous bill, credit will also be given on one month's prior bill.
7. A Lifeline Service customer cannot be disconnected for the non-payment of toll charges.
8. If Call Blocking Service is available and the customer has elected Call Blocking Service, a Service Deposit cannot be collected to establish Lifeline Service. If Call Blocking Service is not available, the Company may require a Service Deposit to establish Lifeline Service.

(D)

(D)

Issued 12-14-01 Applicable to bills rendered on and after 1-1-02

PSCW Authorization by order No.

Letter JAN - 4 2002

Form 10 Rate

PUBLIC SERVICE COMMISSION OF WISCONSIN
TELEPHONE RATE FILE

AMHERST TELEPHONE COMPANY

Name of Utility

Exchange	ALL
Section No.	4
Sheet No.	6.1
Amendment No.	75

EXCHANGE ACCESS SERVICES

LIFELINE SERVICE (Cont'd)

C. RATES AND CHARGES

The applicable monthly rate for Lifeline Service is determined by the sum of the rates for the services specified in 1. following and applying a credit based on the sum of the credits as specified in 2. following.

1. Lifeline Service

Residence Network Access Line (including EAS) at the rate specified elsewhere in this tariff.

Touch Calling Service (if applicable) at the rate specified elsewhere in this tariff.

911 Service (if billed on the Customer's telephone number) at the rate specified elsewhere in this tariff.

End User Common Line (EUCL) Charge.

2. Lifeline Service Credits

End User Common Line Charge (EUCL) as specified in the NECA Tariff.

Federal Lifeline support credit as specified by the Federal Communications Commission (FCC) for Universal Service Support for Low-Income Consumers.

State Lifeline support credit as specified by the Public Service Commission of Wisconsin in Wis. Admin. Code PSC 160.062.

3. Lifeline Service monthly credit

The Lifeline Service monthly credit is \$10.00.

(1)

Issued 7-1-03 Applicable to bills rendered on and after 7-1-03

PSCW Authorization by order No. JUL 15 2003
Letter

FCC Form 481 – Line 3010 – Milestone Certification, 47 CFR §54.313(f)(1)(i)

SAC: 330843
State: WI
Name: Amherst Telephone Company
Submission: 7/1/2015

Amherst Telephone Company hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

**FCC Form 481 – Line 3012 – List of Community Anchor Institutions to Which the ETC
Newly Began Providing Service, 47 CFR §54.313(f)(1)(ii)**

SAC: 330843
State: WI
Name: Amherst Telephone Company
Submission: 7/1/2015

The FCC's *USF/ICC Transformation Order* requires a listing of community anchor institutions to which the ETC newly began providing broadband service in the previous year.

The FCC has defined community anchor institutions in Section 54.5 of its Rules as "schools, libraries, health care providers, community colleges, other institutions of higher education, and other community support organizations and entities."

In addition to existing served subscribers, Amherst Telephone Company newly begin providing access to broadband service to one additional community anchor institutions in calendar year 2014:

- Rosholt Branch Library, 137 North Main Street, Rosholt, WI 54473.

REDACTED - FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION
AMHERST TELEPHONE COMPANY (SAC 330843)
ATTACHMENT - LINE 3026

ATTACHMENT REDACTED IN ENTIRETY